

number of small square objects located along the edge of the property line separating the Maine Central Railroad and the subject property which are unknown and the above-ground fuel tanks observed during our site reconnaissance are not visible in this aerial photograph.

The adjacent northeastern outparcel does not appear as intensively developed as observed in previous aerial photographs. It contains two small unknown structures. The remaining portions of the subject property and surrounding adjacent properties appear essentially unchanged from previous aerial photographs. However due to the scale of this aerial photograph much of the detail visible in previous aerial photographs is not visible.

An undated oblique aerial photograph provided by Mr. Keddy, view the subject property north-northeast from across the Presumpscot River. It shows the site developed as observed in the 1962 aerial photograph. There is a small low roof structure off the south side of Building No. 5 in the current location of Building No. 6. There is also a small sandbar in the Presumpscot River downhill from the substation site. There are no visible signs of an outfall along the southern side of Building No. 4.

Interviews: Based on our conversation with Mr. Lawrence Keddy and Mr. Bruce Crawford at the time of our site reconnaissance the subject property was the site of a paper mill during the early to mid-1900's. Then during the early 1960's for a short period the site was occupied by the Maine Steel Company who manufactured steel buckets for loaders and heavy equipment. The site was then occupied between the late 1960's and early 1970's by Grinnell Corporation, a subsidiary of ITT. Grinnell Corporation manufactured sprinkler pipe materials within the subject building. Then during the mid 1970's the site was occupied by Park Corporation a heavy equipment liquidator who was responsible for selling most of the heavy equipment previously owned by Grinnell Corporation. And finally the site was occupied by National Metal Converters of Windham (aka New England Steel Company) between 1975 and 1978 when Mr. Keddy took possession of the property.

Regulatory Record Review: Based on our review of the CERCLIS (Hazardous Waste Discharges) list and RCRA (Hazardous Waste Generator) list published by the U.S. EPA for the State of Maine (9 and 10 February 1993) the subject property is not currently listed. However the northern adjacent property across Depot Street is the site of New England Antigenetics listed as a small quantity generator. Small quantity generators are producers who generate 100 kilograms per month but less than 1,000 kilograms per month of non-acutely hazardous waste.

Based on our review of the Maine Department of Environmental Protection (MDEP) spill report list dated 10 February 1993 neither the subject site nor the adjacent surrounding properties have had reported on-site petroleum releases.

Based on our review of the MDEP Bureau of Oil and Hazardous Materials Control Division list of all locations reported, there are no listed discharges within or in the vicinity of the subject property.

At the request of Mr. Lawrence J. Keddy our regulatory record review did not include direct contact with MDEP relative to the subject property, the adjacent Depot Energy Company or New England Antigenetics.

III. POTENTIAL SITE CONTAMINATION:

Lead Based Paints: A review of the subject facilities relative to potential sources of lead based paints (LBP's) was not conducted since current state and federal regulations addressed LBP'S only in commercial building where exposure to children is possible (e.g. schools and daycare centers).

Asbestos Containing Materials: Under the clean air act of 1970 the EPA has been regulating many asbestos containing materials (ACM'S) which by EPA definition are materials which have more than one percent asbestos. In the mid-seventies, several major kinds of asbestos containing materials, such as spray applied insulation, fireproofing and acoustical surface materials were banned by the EPA because of growing concern of health effects (particularly cancer) associated with exposure to such materials.

Based on information obtained during this assessment regarding the age of the subject facility a review of the potential asbestos containing materials is considered necessary.

A number of areas of concern relative to potential asbestos containing materials were observed during our site reconnaissance. Specifically visibly friable steam line insulation throughout Building No. 4, acoustical ceiling tile in Building No. 1 and resilient flooring. Transit panel roofing in Building No. 6.

This limited asbestos survey is intended as an assessment of the current accessible and visible interior materials of the subject facility and is based on the current condition and suspected age of the materials. It is not an inspection, sampling and testing program designed to account for all potential asbestos containing materials within the subject facility. Furthermore it does not address potential asbestos containing materials within site machinery, equipment, generators, furnaces, holding tanks, and so forth.

We recommend that a comprehensive asbestos inspection and testing program be implemented within the subject facility and on-site equipment and machinery.

IV. CONCLUSIONS:

The subject site is currently developed as a large industrial facility as detailed in Figure No. 2. A portion of the facility is currently utilized as a machine shop. The subject property was developed in the early 1900's as a paper mill and during its lifetime has been utilized as a steel mill and forging shop, manufacturing steel sprinkler pipes, heavy equipment parts and concrete reinforcing steel.

Based on our observations during our site reconnaissance, our review of city records, regulatory agency lists, historical aerial photographs and site interviews there is potential concern of site soil contamination that may require remediation.

Furthermore there are a number of areas of concern within and in the vicinity of the subject property that would require more detailed investigation relative to their potential for surficial and subsurface contamination of the subject property.

1. Based on our conversations with Mr. Keddy and Mr. Crawford there is known petroleum contamination around the 10,000-gallon above-ground petroleum tank. However due to snow cover the area was not visible at the time of our site visit.
2. The location and condition of the fuel lines from the above-ground 10,000 and 15,000-gallon fuel tanks is unknown. Further investigation of their location and condition is recommended.
3. A garage building existed in the 1970's in the southeastern quarter of the subject property. Further inspection as well as subsurface investigation is recommended relative to activities in this area.

4. The old substation pad and transformer pad adjacent to Buildings Nos. 5 and 6 require further inspection and subsurface investigation relative to potential contamination from Polychlorinated Biphenyls (PCB's).
5. The 10,000-gallon and 15,000-gallon above-ground fuel tanks were not observed in the 1953 and 1962 aerial photographs, and the source of fuel for the subject site then is unknown. Furthermore it is believed that the coal burning plant (Building No. 3) was not operational during this period. We recommend further investigation into the source of fuel utilized during this period and the location of fuel storage.
6. An unknown structure observed in the 1962 aerial photograph adjacent to and north of Building No. 4 requires further inspection and subsurface investigation relative to potential sources of contamination and underground structures.
7. The outfall location of the large floor drain observed in the basement area of Building No. 4 is unknown. Further investigation is required.
8. Access to Building No. 3 was not possible due to the collapse of the roof and extensive snow cover within the facility. A complete walk-through of this portion of the subject property as well as the remaining snow covered areas of the site is recommended once the snow cover has melted.
9. A complete regulatory record review of the nearby Depot Energy Company site and New England Antigenetic site is recommended.

V. CLOSURE:

This review has been performed for your use in connection with the property on Maine State Route No. 202 in South Windham, Maine. The conclusions of Consla Geotechnical Engineering, Inc. are based upon the scope of work described herein and the referenced sources of information in accordance with generally accepted environmental engineering practice. Any additional pertinent information which becomes available concerning this site should be provided to CGE for review in order that our conclusions can be revised as necessary.

Thank you for selecting us to perform this study. If you should have any questions or require additional information, please contact us.

Sincerely yours,
Consla Geotechnical Engineering, Inc.

Keith A. Wallace
Staff Engineer

John A. Consla (vs)
John A. Consla, P.E.
President

Enclosures: Fig. No. 1 - U.S.G.S. Quadrangle Map
 Fig. No. 2 - General Site Plan

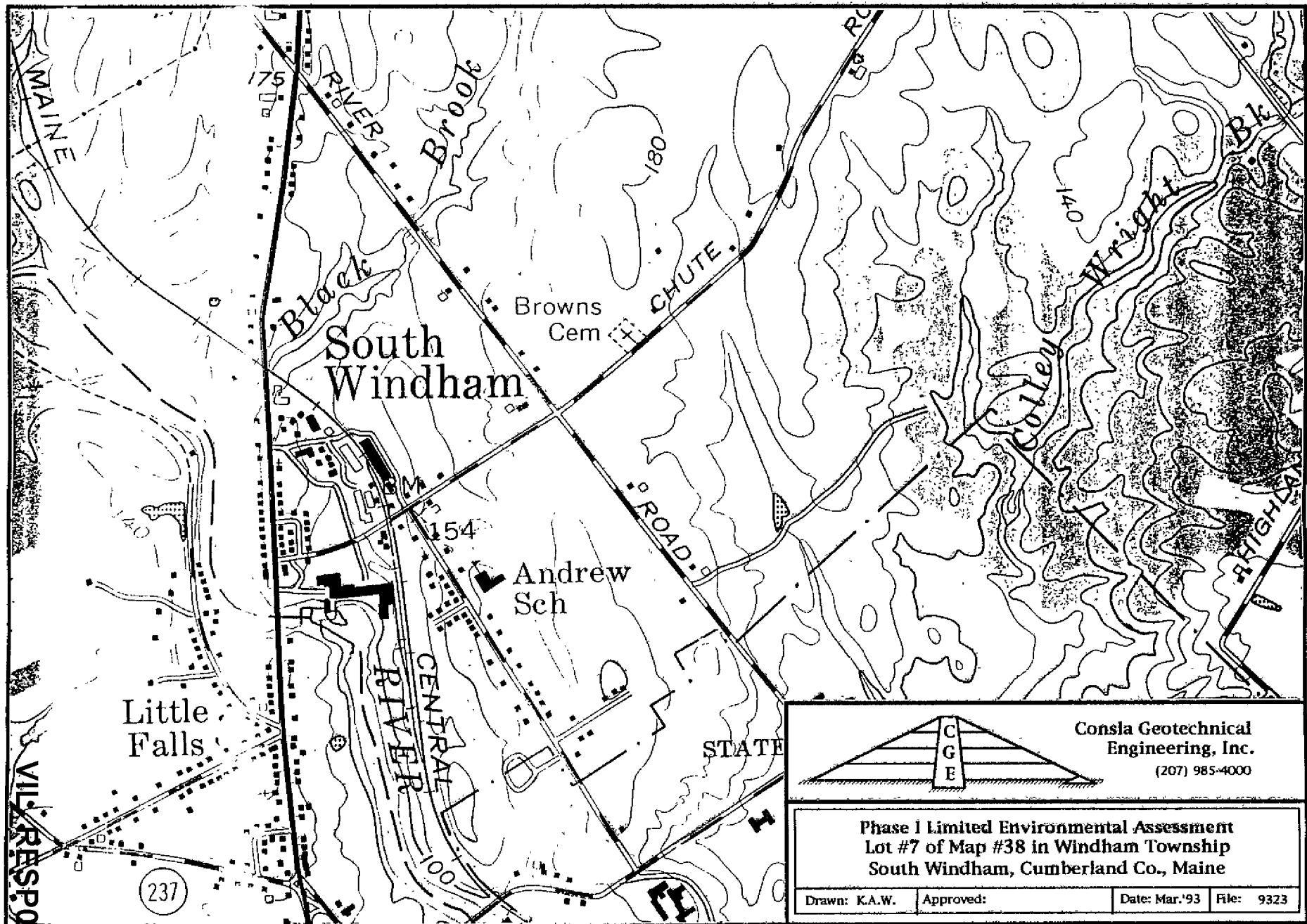
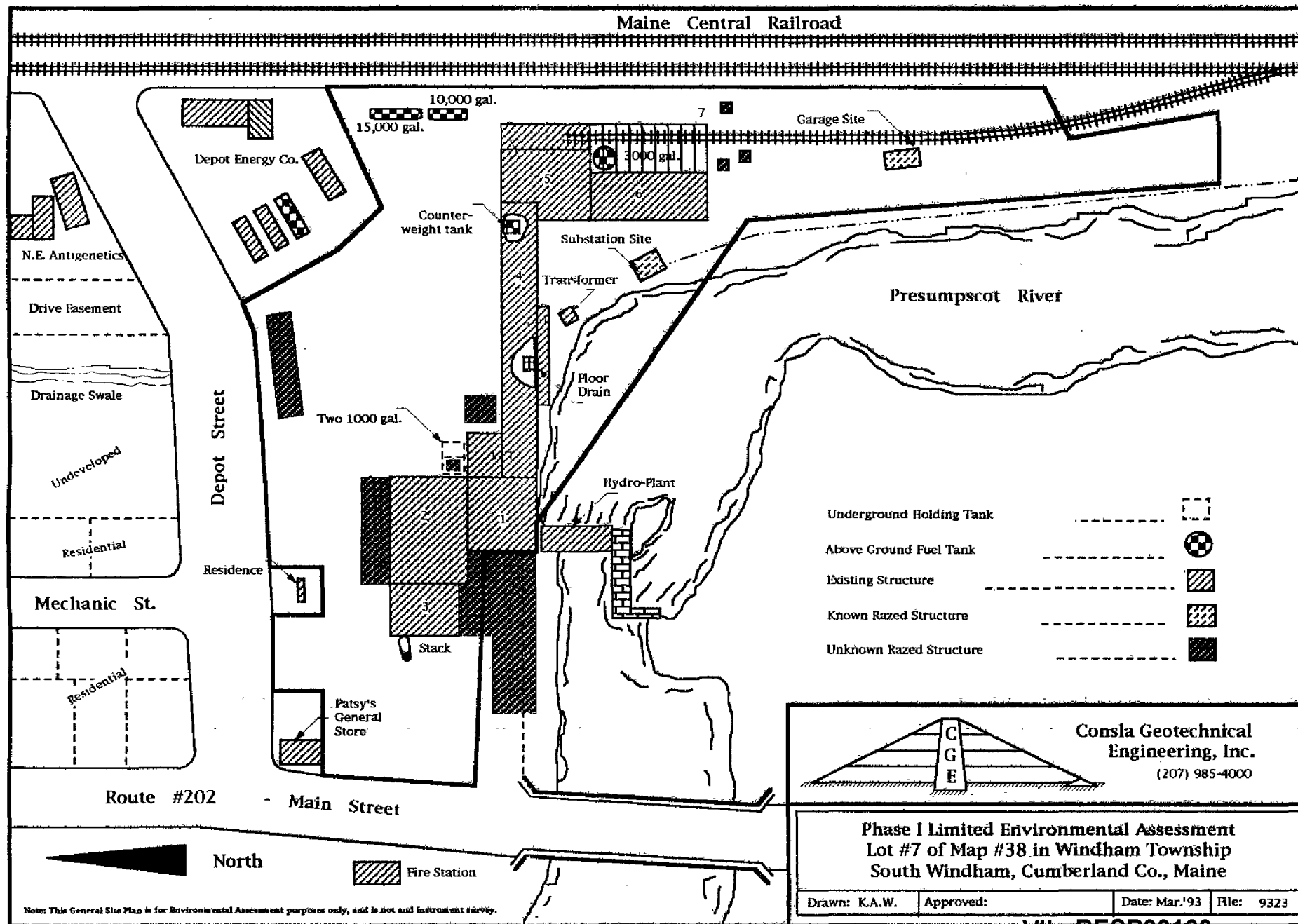


Figure No. 1



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Figure No. 2

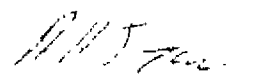
PHASE I ENVIRONMENTAL SITE ASSESSMENT
KEDDY MANUFACTURING COMPANY
SOUTH WINDHAM, MAINE


Submitted to:
Merritt Technologies Corporation
2213 M Street NW, Suite 300
Washington, DC 20037

Submitted by:
Acadia Environmental Technology
4 Milk Street
Portland, Maine 04101

March 2, 1994

Prepared by:


Alison H. Jones
Hydrogeologist


Thomas F. Schwarm, CG
President-Hydrogeologist



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March 2, 1994

Kelly Hattel
Merritt Technologies Corporation
2213 M Street NW, Suite 300
Washington, DC 20037

RE: Phase I Environmental Site Assessment Report
Keddy Manufacturing Company
South Windham, Maine

Dear Ms. Hattel,

Acadia Environmental Technology prepared this report of the Phase I environmental site assessment of Keddy Manufacturing in South Windham, Maine. Enclosed please find an original of the report, and one copy. Please feel free to call us if you should have any questions.

Acadia appreciates working with you on this project.

Sincerely,



Alison H. Jones
Hydrogeologist



Thomas E. Schwarm, CG
President-Hydrogeologist

Introduction

Purpose

Acadia Environmental Technology (Acadia) was retained by Merritt Technologies, Inc (Merritt) to conduct this Phase I environmental site assessment of the Keddy Manufacturing Facility at 7 Depot Street in South Windham, Maine. The objective of this assessment is to evaluate the presence, or the likelihood of the presence, of environmental concerns that could pose liabilities to a future owner.

Limiting Conditions

This assessment was conducted under adverse winter conditions. Virtually all of the buildings were unheated. Water leaking from the roofs had frozen on many of the floors and walls. Walking was hazardous and not all areas were accessible. Generally, there were no operating lights in the buildings. The former boiler building, which had collapsed, was unsafe to enter. Its interior was covered with snow which hid the contents. More than one foot of snow covered the site during the entire investigation period. Almost all of the ground surface could not be inspected for stained soil, stressed vegetation, or other evidence of disposal of liquid or solid waste.

Acadia performed this Phase I environmental site assessment in a professional manner using that degree of skill and care exercised for similar projects under similar conditions by reputable and competent environmental consultants in Maine. Acadia shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed to it at the time the investigation was performed. The conclusions presented in this Report were based solely upon the services described, which were performed within the time and budgetary constraints imposed by the customer.

This report shall not be construed to create any warranty of representation that the real property of which the investigation was conducted is free of pollution or complies with any or all applicable regulatory or statutory requirement, or that the property is fit for any particular purpose. No third party is entitled to rely upon any information or opinions contained in this report.

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Scope of Work

The scope of work of this Phase 1 site assessment included:

- Background research, including review of Maine Department of Environmental Protection (DEP) records and Sanborn maps.
- Interviews with people who have knowledge of the property, including town officials and representatives of the owner.
- Site walkover to view and photograph items that may be of environmental concern.
- An additional site visit for follow-up observation.
- Preparation of this report.

Site Description

Location and Legal Description

The Keddy Manufacturing Facility is located in South Windham, Maine at 7 Depot Street near the intersection of Route 202 and Depot Road. The property is specified as Lot 7 of Map 38 on the Windham tax assessors maps as shown in Figure 1.

Site and Vicinity Characteristics

The Keddy facility is located in a small town with mixed land uses. Zoning in the area includes industrial, medium-density residential, and general shoreland development zones. The town has public water. Public sewer is also available. The Presumpscot River runs through the town adjacent to the Keddy property (topographic map, Figure 2)

The Keddy property has frontage on Route 202 and Depot Street, it encompasses approximately 85 acres. Buildings at the site comprise approximately 90,000 square feet on several levels (figure 3). One side of lot is adjacent to the Presumpscot River and the building extends over the river in some locations. This river is classified as Class C by the DEP. The Keddy property is zoned for industrial use

The public sewer system runs in front of the facility near Main Street. However, the facility has not been hooked up to the sewer system to date. Two 1000 gallon underground concrete sewerage holding tanks have been and are still being used. The buildings are heated by oil-fueled boilers. There is no cooling system.

There are gravel roads and parking areas on the Keddy property. Their approximate locations are indicated on Figure 3. In addition, a railroad track crosses the back of the property behind building 5 and 6.

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Information reported by user regarding environmental liens or specialized knowledge or experience

No information of previous environmental problem, hazardous waste disposal, leaking tanks, lead paint or asbestos use was reported by the owner's representative

Current uses of property

The property has been leased by the Barnard Marquit Corporation, a steel foundry company, since 1978, however the company has never had any operations at this site. Barnard Marquit obtained a Waste Discharge License from the Maine DEP on June 18, 1987 for 0.56 million gallons of non-contact cooling water per day (Appendix A). However, the owner's representatives and the monitoring reports indicate that there has been no discharge from the facility.

A machine shop is currently operating in building 1 on the ground level. This shop is operated by the Cumberland Corporation (owned by Mr. Keddy) for repair and maintenance of his other properties. The machine shop uses fuel oil, kerosene, water-soluble cutting oil, paint, and small quantities of other chemicals. Waste oil is taken to a garage where it is burned.

Background Information

Past uses of property

The Keddy property has been used primarily for wood, wood pulp, and paper for a variety of industries. The Sanborn maps show that the mill was built in different stages. The initial buildings are shown on the 1885 map. The layout of the existing buildings is consistent with paper mill use. The 1934 Sanborn map (Appendix B) shows the most buildings. Some buildings and tanks shown on the maps are no longer present.

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The following chronology was compiled from Sanborn maps and information provided by Ann Googins, who represented the owner, Mr. Keddy

Pre-1885-Apr 4, 1900 Sebago Wood Board Co.

July 25, 1913	Dam Height Agreement E.I. DuPont Demours Powder Co. and Androscoggin Pulp Co
March 29, 1917	From Cora E. Libby to Androscoggin Pulp Co.
May 1, 1917	Fiske Warren, Cornelia Warren, & William Dunbar, Residuary Trustees to Androscoggin Pulp Co.
September 8, 1919	From William H. Bickford to Androscoggin Pulp Co.
March 7, 1940	Robert Gair Co., Inc. to Cumberland Securities Corp.
April 29, 1941	Sewer right of way to Julia L. Siciliano
October 6, 1944	Right of way to Central Maine Power
June 25, 1945	Indenture--Cumberland Securities to Windham Fibres, Inc.
January 29, 1954	Indenture portion--Cumberland Securities to Atlantic Mills
August 19, 1954	Indenture portion--Irving Fox et al to Atlantic Mills, Inc
June 6, 1961	Atlantic Mills, Inc. to Keddy Manufacturing Co.
October 30, 1961	Quit-claim deed--Atlantic Mills, Inc. to Lawrence J. Keddy
October 17, 1969	Keddy Manufacturing to Grinnell Corp.
August 21, 1973	ITT Grinnell Corp. to Park Corp
May 9, 1974	Park Corp. to Lawrence J. Keddy
January 3, 1975	Mortgage and Security Agreement--National Metal Converters of Windham, Inc
January 17, 1978	Lawrence J. Keddy takes back property

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Manufacturing of wood pulp and box board was the primary activity at the site from before 1885 until about 1940 when Sebago and Androscoggin Pulp and Paper operated the facility. As part of their activities, the Sanborn maps show there was a machine shop at the site as well as coal and oil storage. Sanborn maps from 1922 to 1944 indicate that two large fuel oil storage tanks (150,000 and 250,000 gallons) were located on the property near Depot Street.

Cumberland Securities operated the facility as a box board mill, according to the 1944 Sanborn Map. The use is unclear from 1944 until Keddy bought it in 1961. Apparently Maine Steel fabricated snowplow blades at the site sometime during this period. According to Ann Googins, Baker Refrigeration and Bluestein operated at the site. We were unable to determine when these businesses operated or what they did. Keddy installed metal working equipment for steel melting and forging. According to the owner's representative, they made pipe flanges by induction melting and drop forging. Machining of the flanges was done at an out-of-state facility. Grinnell (later acquired by ITT) bought the facility and product line in 1969.

According to the Sanborn maps, a railroad track crossed the back of the property for much of its history. A railroad spur also wrapped around the building.

In 1975, National Metal Converters operated a rolling mill and made rebar for concrete at the site. They eventually became New England Steel. The company went out of business in 1978 and Keddy took back the property, leasing it to Barnard-Marquit. Barnard-Marquit has never used the facility.

The paper and steel forging industries generally use a wide variety of chemicals in their day-to-day activities. A list of chemicals associated with these uses is in Appendix C.

Adjoining properties

**Table I:
Current Abutters and Property Uses**

Abutter	Map/Lot	Property Use
Jean Winslow	37/4B	residential
Mary and Lester Coulombe	37/12	residential
Walter and Sandra Thorpe	37/13	residential
Janet Foster	37/20	residential
Merrill Laskey	37/21	residential
Merrill Laskey	38/3	residential
Marjorie Drost	38/5	residential
Merrill Laskey	38/6	Energy Depot--coal storage/sales former train station
Wm & Patricia Dillios	38/8	residential
"	38/9	Corner store
S. Windham Fire Dept	38/12	Fire House
Scott Paper	38/10,11	Hydroelectric Dam
Richard Rogers	38/48	Commercial
Richard Pierce	38/41	Commercial
Depot Street Condominiums	38/49D	offices, formerly owned by L.C. Andrew lumber mill
VA Regional Loan Guarantee Division	38/39	Commercial
Charles Dickenson	38/40	Commercial

The L.C. Andrew's lumber mill is shown on the 1922 Sanborn map as a wood planing and box mill. On the later maps a milling and lumber yard is indicated. The yard was called and we were told that only sawing and milling operations were conducted.

At Energy Depot, a 500-gallon underground gasoline tank was removed in the fall of 1993. Some oil was observed in the hole. The DEP has not required any investigation or cleanup. This facility was used for coal and oil storage. There may have been a vehicle repair garage at the site. There is little current activity at the site.

Public Information Search Results

Acadia conducted a file search at the DEP to determine if there had been any reported hazardous waste or petroleum spills or investigations at the site. No records pertaining to this property were found. There were no references to the property under the US EPA Hazardous Waste Handlers List. There were no registered underground petroleum tanks or records of tank removals at the site, according to the State's tank listing.

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Information from Site Reconnaissance

Acadia visited the site twice. During the initial visit on February 9, 1994, Bruce Crawford and Ann Googins were interviewed regarding the site history. The buildings, with the exception of the boiler room were walked through. During a second visit on February 22, the buildings were walked through again and the property outside was walked. No compounds were detected in any of these locations.

The buildings are primarily of concrete construction with steel and plastic roofing. There were many roof leaks which resulted in ice on the walls and floors. There were many pieces of heavy equipment including metal furnaces, pulp tanks, rolling mills, presses, and boilers. The buildings are huge with high ceilings and extensive basements. The owner's representatives guided us through the whole complex since it would have been difficult for an outsider to find all the rooms and buildings. During the first visit travel was extremely difficult because of the extensive ice in the buildings and the extreme cold. The second visit was on an unusually warm day. During that visit the snow on the leaky roofs was melting so it was essentially raining inside. Water had pooled on the icy floors. A Photovac photoionization detector (PID) with a 10.6 eV lamp was used to test for volatile organic compounds in the floor drains. No chemicals were detected. Most of the floor drains were in the area of the mill that is over the water. It is likely that most waste liquids in the past were discharged through these drains directly into the river. For many years, two 1,000-gallon underground concrete holding tanks have been used to store waste water. These are pumped out periodically. If these tanks leaked, they could have released some industrial chemicals into the soil.

The property outside the building was covered with more than a foot of snow during both visits. At the time of the second visit, the snow had melted on some of the south-facing slopes along the river. In these areas metal slag, rusted drums, metal scrap, and what may have been gasket material (possibly containing asbestos) was found. Considering the small amount of soil that was exposed, it was surprising how much trash was seen. This may be indicative of generally poor waste handling practices. Soil samples were collected and analyzed in this area, no chemicals were detected. An abandoned sewer line was identified on the property. Water was discharging from it but there was no odor and the PID did not detect any chemicals.

Acadia observed the following:

- Piles of metal slag, rusted drums, and other metal waste that appear to be associated with the mill were observed on site and on the adjoining Scott Paper property. Considering how much snow was present, it was surprising how much debris was found.
- Possible asbestos-containing materials (ACM's) are present at the site. These include refractory materials, refractory brick, furnace mortar material, dust from refractory

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materials, pipe insulation, and exterior siding. The use of this site is consistent with the widespread use of asbestos

- Peeling paint is prevalent. It is likely that some of the paint contains lead and may need special handling and disposal
- Two large reportedly concrete sewerage holding tanks were reported.
- There are numerous small containers of oil, paint, and solvents.
- There is a substantial electrical power infrastructure at this site. Many transformers were seen. Most of these appear to be dry so they would not contain PCBs. There was one wet transformer (see photos, Appendix D) and there may be others that were not seen. These may require testing, and if they contain PCBs, special disposal
- There are two 10,000-gallon above-ground fuel oil storage tanks adjacent to the railroad tracks behind the building. These were apparently used to store heavy oil. These are no longer in use. There is some spilled oil, which looks like asphalt, under the tanks.
- There is a 275-gallon heating oil tank in use in the machine shop.
- There is a 3000-gallon above-ground fuel oil tank outside of the building (see photos). This tank was used for starting the boiler that is not currently used.
- Oil is stored in a 55-gallon drum on the ground level of building 1 for heating the front offices.
- There is a milk tank that was reportedly never used

Information from Interviews

Acadia interviewed Roger Timmons, the Code Enforcement officer of Windham, Maine on February 11, 1994. Mr. Timmons was not familiar with the operations of the mill or chemicals used at the site. He did remember slabs from old buildings at the site that are now gone, possibly the old machine shop shown on the Sanborn maps. Acadia could not find these slabs because of snow cover. He mentioned that a sewer discharge line used to run through the property from the residential area and the school to the east. This line was never removed. Acadia found a drainage line that could have been that sewer line. He noted that there was heavy truck traffic on the north side of the building near Depot Road. He recommended that the ground surface be inspected for staining.

Charles Hammond, the Chief of Fire and Rescue, Windham Fire Department, was interviewed on February 10. He recalled an oil tank in the boiler room that was exposed when the building started to collapse. He did not know if it was still there. He did not know about chemical use at the site.

Conclusions and Recommendations

Based on direct observations, interviews, and background research, Acadia concludes the following:

- The types of businesses that have operated at the site traditionally use a variety of chemicals in their routine operations (Appendix C). While Acadia could not document use of chemicals other than fuel oil and refractory materials, it is likely that a variety of chemicals were used at the site during the past century. Most waste was probably discharged into the river, but it is possible that some may have been disposed of on the property.
- Acadia observed possible asbestos-containing materials (ACM's) at the site. Among the possible ACM's are: pipe wrap, bags of refractory materials, furnace brick and mortar, dust from refractory and furnace materials, and exterior siding. We recommend retaining a company to do a thorough asbestos assessment.
- Even though most of the site was covered by one foot of snow, we observed scrap steel, slag, and rusted drums in several places. We expect to see more waste materials when the snow melts. The amount of trash suggests poor waste handling practices, which may indicate that other materials were disposed of on site. If petroleum, ACM, solvents, or other chemicals were discarded on site, clean up may be required. Refuse along the stream bank may need to be removed to comply with State laws. Some of this refuse is located on the adjacent S.D. Warren property, but the material appears to be from the steel mill. This may constitute a liability.
- There is evidence of oil spillage near the two 10,000 gallon oil tanks. Some soil removal may be necessary in this area.
- Large areas of peeling paint were observed. If this paint contains lead, special handling and disposal may be necessary that could increase rehabilitation costs. There may be lead-paint dust in the building from paint degradation or previous removal. We recommended paint evaluation by a qualified consultant to determine if costly remediation will be necessary.
- There are numerous small containers of oil, paint, and solvents that should be removed by the current owners before the sale is completed. Most of these containers are in the machine shop and are currently in use.
- This property has heavy duty electrical service. Many transformers were observed that the owner's representative told us were dry, so they should not contain PCBs. There is one transformer (not in use) in the building which may be wet and could possibly contain PCBs. This transformer should be removed by the current owner. The current owner should retain responsibility for any wet transformers found at the site.

- Sanborn maps indicate that there were very large oil storage tanks on the Depot Road side of the mill. The maps also show that there was a machine shop near the corner of Depot and Main Streets. These areas are now covered with snow, and should be inspected for oil and chemical releases after the snow melts.
- The mill's waste water is stored in two 1,000-gallon underground concrete tanks. These tanks are pumped out periodically. These tanks and their supply lines may have released oil, solvents, or other chemicals into the soil.
- There may be petroleum in the soil near the old fuel tank locations on Depot Road, near the existing 10,000 gallon tanks, near the 3000 gallon tank, or near the old machine shop.

Based on the historical site use, materials observed at the site, and the evidence of poor waste handling, Acadia recommends further investigation of this site to evaluate the potential cleanup costs that may be incurred to comply with State and Federal regulations. This investigation work should be conducted after the snow melts and the ground surface is visible.

On the positive side, because this mill is so close to the river (it is over the river in some places), most liquid wastes were probably discharged directly into the river. We observed many floor drains that emptied directly into the river.

Consla Geotechnical Engineering, Inc.



- Geotechnical Engineering
- Site Exploration
- Environmental Engineering
- Geologic & Hydrogeologic Investigation

CONFIDENTIAL

18 March 1993
File No. 9323

Preti, Flaherty, Beliveau & Pachios
443 Congress Street
Portland, ME 04101

Attention: Mr. Harold C. Pachios

Subject: Phase I Limited Environmental Assessment
Lot No. 7 of Map 38
Windham Township
South Windham, Cumberland County, Maine

Dear Mr. Pachios:

As requested by Mr. Laurence Keddy, we have completed our Phase I Limited Environmental Assessment of the subject property. This assessment provides our professional opinion relative to the potential for subsurface site contamination from toxic and or hazardous waste materials. Environmental in the context of this report does not include an ecological evaluation of the resources of the site. Further limitations of this Phase I Limited Environmental Assessment are discussed in the attachment form. This report documents our findings and presents our preliminary level engineering conclusions.

I. HISTORICAL INFORMATION:

Location and Description: The subject property is located in Lot No. 7 of Map 38 in the Windham Township, Cumberland County, Maine. The property boundary survey referenced during this environmental assessment of the subject property was prepared for National Metal Converters and performed by Owen Haskell, Inc., and signed on June 19, 1974 by Mr. Steven S. Shaw State of Maine land surveyor registration no. 779.

The subject property is accessible from Main Street (Maine State Route No. 202) to the west, Depot Street to the north, the Maine Central Railroad line to the east, and the Presumpscot River to the south.

Available Town History: Based on our review of the township of Windham property assessor's record and base map, the subject property is currently owned by Mr. Lawrence J. Keddy and has been since 17 January 1978. National Metal Convertors of Windham, Inc. owned the subject property between 2 January 1975 and 17 January 1978. Mr. Lawrence J. Keddy owned the property between 16 May 1974 and January 1975. Park Corporation owned the subject property between 28 August 1973 and May of 1974. Grinnell Corporation owned the subject property between 17 October 1969 and August of 1973. Keddy Manufacturing Company owned the subject property between 6 June 1961 and October of 1969.

Drainage and Waterbodies: Based on our review of the 1952 Gorham, Maine U.S.G.S. Map (Figure 1), the subject property appears to slope south and west down-gradient to the Presumpscot River.

Based on our review of the Hydrogeological Survey of Significant Sand and Gravel Aquifers in Cumberland County, co-published by the U.S.G.S. and MDEP no mapped significant sand and gravel groundwater aquifers exist within the site area.

According to the Cumberland County U.S.D.A. soil survey, the subject property is likely composed primarily of cut and fill land which consists of excavated soil materials and bedrock from highways, airports and building sites that have been redistributed in adjacent areas to likely depths ranging from 2 to 15 feet. The materials consist of a mixture of sandy, clayey, silty, cobbly and gravelly material.

Because of the variability of the soil material at any one location, on-site investigation is needed to determine the type of material in-place. The northern adjacent property consists of scantic silt loam. This soil is wet throughout the year while permeability is moderate in the upper part of the horizon and slow to very slow in the lower part. Runoff is slow and available water capacity is high.

II. SITE OBSERVATION:

Structures: The main buildings within the subject property are as detailed in Figure 2 of the attachments. The following information is based on our site observations and review of the 1976 Town of Windham commercial properties appraisal report prepared by United Appraisals of East Hartford, Connecticut.

Building No. 1 (old manufacturing and offices) is a two-story building with a full basement constructed of concrete block and reinforced concrete framing totaling approximately 14,600 sq. ft. in area, and likely built in the 1920's.

Building No. 2 (forge and remelt shop) is a single-story, high roof, brick and concrete block building, approximately 9,300 sq. ft. in area, built in the early 1900's, remodeled in the 1960's.

Building No. 3 (old boiler house) is a single-story, high roof, brick building, approximately 4,700 sq. ft. in area, with a large slab, coal hopper, and smoke stack, all built in the early 1900's.

Building No. 4 (old melt building) is a two-story, reinforced concrete framed building, approximately 24,000 sq. ft. in area with two, 1,000 sq. ft., reinforced concrete framed out-buildings, all built in the early 1920's.

Building No. 5 (old storage and manufacturing) is a two-story, brick building 13,200 sq. ft. building and a one-story, reinforced concrete framed addition approximately 2,500 sq. ft. in area. The main building was constructed in approximately 1910.

Building No. 6 (old press building) is a one-story, steel frame building, approximately 4,800 sq. ft. in area, with a one-story, steel framed addition, approximately 1,600 sq. ft. in area apparently built in the 1960's.

Building No. 7 is a single-story, steel framed, overhead rail crane bay with no listed date of construction.

Our representative was accompanied by the building shop foreman, Mr. Bruce Crawford, and the following observations and comments regarding the subject facility are based on Mr. Crawford's site knowledge of the property history, and the observations of our representative during the site visits on 2 and 16 March 1993.

The first floor of Building No. 1 is currently in use as a small mechanical repair shop. The second floor is unoccupied office space. The basement portion of Building No. 1 is also unoccupied space previously utilized as a reinforcing steel manufacturing building. A large bay of 8 reinforced concrete above-ground tanks were observed in this area which were apparently utilized for cooling water storage.

Building No. 2 is currently unoccupied and contained two large, oil fired remelt furnaces and reinforcing steel manufacturing equipment.

Building No. 3 is currently unoccupied and abandoned due to a roof collapse. Therefore a walk-through of this portion of the subject building was not conducted due to the unstable condition of the structure and extensive snow cover within the interior portions of the building.

Building No. 4 is a large, two-story, 300-foot long section of the subject facilities that is currently unoccupied and utilized as storage space for a variety of heavy machinery related to the previous steel manufacturing operation, and mechanical equipment belonging to Mr. Lawrence Keddy. One large floor drain was observed in the basement portion of Building 4 along the southwestern end adjacent to the Presumpscot River. The outfall location is unknown. A large above-ground steel crane counterweight tank observed in the northeastern corner of Building 4 had been adapted for use as a fuel oil tank. The tank apparently is not currently in use and contains a small quantity of oily sludge in its bottom. Also observed within the basement portion of this facility were a number of mechanical metal hammer units founded upon a large reinforced concrete slab. Behind the hammers were large oily stains on the northern wall of the Building which were described as a bond breaker spray composed of oil and graphite. This material apparently was contained in small metal box tanks on the north wall and piped down to the mechanical hammer units.

Building No. 5 is currently unoccupied and in use as storage for mechanical equipment from the previous steel mill shop including a large steam generator on the first floor of the facility. The main heating fuel pump for the entire building was located in the northwest corner of Building No. 5 at its intersection with Building No. 4. This pump was located on the first floor, with a large petroleum stain residue around the perimeter of the pump system (all located on a concrete deck).

Building No. 6 is currently in use as a heavy equipment storage area. There were no visible signs of petroleum stains on the floor slab in this area.

Building No. 7 is a large, open-top rail crane bay. Included in the northwest corner of the bay was a large, round, 3,000-gallon, above-ground petroleum storage tank. The tank is constructed on a reinforced concrete slab with reinforced concrete walls on four sides. No floor drains are known to exist within the area. However it must be noted that during our walk-through of this area approximately 2-feet of snow cover was observed on and around the tank obstructing our view of

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surficial conditions. Also observed within this area was a railroad spur branch of the Maine Central Railroad track located along the eastern boundary of the subject property.

Grounds: An attempt was made to walk-through the grounds of the subject property, specifically the substation pad site and above-ground fuel storage tanks site. However due to the extensive snow cover on-site at the time of our site visit a visual assessment of surficial conditions was not practicable.

Utilities: According to the shop foreman, Mr. Bruce Crawford, the subject buildings are serviced by an off-site water supply system and sewage is contained in two underground, 1,000-gallon holding tanks located near the southeast corner of Building No. 2. At the time of our site visit the sewage tank lines were reportedly frozen and not operational.

Heating and Fueling Systems: Building No. 1 of the subject facility is the only portion currently occupied and in use, and is heated by a fuel oil fired, forced hot air furnace. The fuel tanks for this area consist of small 275-gallon and 55-gallon fuel tanks located within the first floor portion of the building and constructed on a concrete slab. Also observed within Building No. 1 was a single 55-gallon drum used for waste oil. There were also a number of one-gallon and five-gallon gasoline containers within the shop area, utilized for small equipment fueling.

The remaining portions of the subject facility (Building Nos. 2 through 7) were not heated at the time of our site visit. However, the buildings heating fuel distribution system design apparently was as follows:

The 10,000 and 15,000-gallon above-ground fuel tanks located in the northeast corner of the subject property are the primary sources of heating fuel. The distribution pipe system enters the building somewhere along the northeast corner presumably in the area of the fuel pump observed in the northeast corner of Building No. 4 adjacent to the old above-ground counterweight tank observed on the main floor. Once inside the building the fuel oil conduit runs along the north wall of Building No. 4 on the main floor, branching off into Building Nos. 1 and 2. Since Building No. 3 was abandoned due to the collapse of the roof and extensive snow cover no inspection of this area was made. The fuel source for Building Nos. 5 and 6 appears to be a 3,000-gallon above-ground tank located in the northwest corner of Building No. 7.

Adjacent Properties: At the time of our site visit the adjacent properties to the north across Depot Street, to the west across Main Street (Route No. 202), and to the east across the Maine Central Railroad line were all observed to be developed residentially with the following exceptions.

The northwestern outparcel of the subject site is developed with a large, two-story structure currently occupied by Patsy's Country Store and Video Rental and appeared to be developed residentially on the second story. There were two large propane tanks observed, above-ground, along the northeast corner of the building and no other fuel source was visible from the road.

The north central outparcel was observed to be developed residentially with a small manufactured home and at the time of our site visit no heating fuel tanks were visible from the road.

The northeastern outparcel of the subject property is developed as the Depot Energy Company a commercial vendor of coal and fuel oil. At the time of our reconnaissance we observed a large L-shaped, wood-frame building along the eastern boundary, a large rectangular, wood-frame building along the southern boundary, one large above-ground tank and two railroad cars along the western boundary of the Depot Energy outparcel.

The adjacent property west of the subject site across Main Street (Route No. 202) is the South Windham Fire Company truck storage building. An active underground fuel storage tank reportedly exists on this parcel, according to town officials.

The nearby adjacent property due north of Depot Energy across Depot Street is the New England Antigenetics facility and a large self-storage facility.

Historically Mr. Bruce Crawford recalled the Depot Energy property as utilized as the Maine Central Railroad loading house station. Furthermore, Mr. Crawford recalled that the New England Antigenetics and self-storage property were previously occupied by a large lumber mill and warehouse.

The adjacent abutters south and southwest of the subject property are the Presumpscot River, and the S.D. Warren Hydroelectric Plant located off of the southwest corner of Building No. 1 of the subject property.

Site Plan Review: The following information is based on our review of the site plan of the subject property dated June 1974 referenced above. The western access to the subject property off of Route No. 202 is noted as a gravel drive which branches off to the right along a 30-foot wide right-of-way into the main entrance of Building No. 1 and the S.D. Warren Hydroelectric Plant. The left hand branch of the drive runs north into a large gravel parking lot adjacent to Building No. 2 and accessible from Depot Street on two locations east and west of the residential outparcel. There are noted signs of building encroachment from the northwest outparcel onto the subject property.

A second gravel driveway enters the subject property from Depot Street along the western boundary of the northeast outparcel, which branches to the west into a small parking lot entering a large roll-up door located on the northeast corner of Building No. 2. The second branch extends along the eastern boundary around Building Nos. 5 and 7 accessing Building No. 5 on its northeast corner and Building No. 4 on its southeast corner. A large concrete foundation is noted adjacent to the Depot Street entrance of this drive as well as a small drainage ditch which appears to run east to west along the northern boundary with the northeast outparcel and into the catch basin.

Also noted on the site plan is a 24-inch culvert extending under the Maine Central Railroad near the northeast corner of the subject site and draining westward into the above mentioned drainage ditch and catch basin. Also noted in the southeast portion of the site was a small garage building approximately 270 feet south of Building No. 7 which was not observed during our site reconnaissance, possibly due to snow cover.

Also noted within the subject property was a large electrical substation located approximately 50 feet west of Building No. 6 and 100 feet south of Building No. 4 adjacent to the Presumpscot River. The main electrical lines run north and south parallel to the river. This substation structure was also not visible at the time of our site reconnaissance.

Aerial Photographs: Aerial photographs were examined utilizing 10X magnification to study the land use within and in the vicinity of the subject site to gather clues regarding previous activities or businesses that could have affected soil or ground water quality.

A 15 April 1986 photograph (with a scale of 1 in. = 1,000 ft.) shows the subject property and adjacent surrounding properties developed as observed during our site reconnaissance with the following exceptions. Four long rectangular objects and one large square object is visible near the northeast corner of Building No. 2. According to Mr. Crawford who also inspected

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the aerial photographs, the rectangular object were trailer truck storage bins used for scrap metals and materials. The square object apparently is the old counterweight tank currently inside Building No. 4 and in use as a petroleum storage tank. Mr. Crawford also indicated that the old counterweight tank was not utilized as a petroleum storage tank when it was outside the facility.

Also observed in this area was a large square slab adjacent to Building No. 4 with material stored on top. According to Mr. Crawford the materials were scrap wood materials and fencing. The large rectangular concrete slab noted in the above mentioned plan survey review along Depot Street was visible. Mr. Crawford's indicated that the old slab was possibly the site of a shipping building during the early 1900's and later utilized a warehouse facility. The garage building noted on the site plan was not visible in this aerial photograph. However a small structure was visible just north of the old garage location which according to Mr. Crawford was a 40-foot box container used for storing heavy equipment, parts and tires. The small transformer pad observed adjacent to Building No. 4 during our site reconnaissance is visible as is the old substation pad. The adjacent surrounding properties appeared developed as observed during our site reconnaissance.

A 1 May 1976 aerial photograph (with a scale 1 In. = 1,000 Ft.) shows the subject property essentially developed as observed in the previous aerial photograph with the following exceptions. The roof of Building No. 3 did not appear to have collapsed at the time of this photograph. There are visible signs of stored materials adjacent to and north of Building No. 4 and adjacent to and east of Building No. 2 which are unknown with the exception of a large cylindrical object which Mr. Crawford indicated was a large propane fuel tank. A small gravel roadway accesses the subject site from the northeastern outparcel and runs along the eastern boundary. The garage building noted in the site plan review is visible in the southwestern quarter of the subject site and there are visible signs of unknown stored materials along the eastern side of the building. There are also a number of large unknown objects immediately south of Buildings No. 6 and 7.

The adjacent surrounding properties appear to be developed as observed during our site visit with the following exceptions:

The two railroad cars, one above-ground tank and small rectangular building are not visible as noted during our site reconnaissance within the northeastern outparcel. The site appears to be in use for other purposes. There are a number of large square and rectangular objects where the building tank and railroad cars are located. These objects are currently unknown.

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A 11 May 1962 aerial photograph (with a scale of 1 in. = 800 ft.) shows the subject property essentially developed as observed in previous aerial photographs with the following exceptions. The garage building in the southeast quarter is not visible in this aerial photograph and building No. 6 and 7 do not appear to have been built in 1962. The Building No. 6 and 7 area adjacent to the train track spur appears to be in use as a large storage area of unknown materials as well as a number (4 or 5) of small square structures also unknown. This area does not appear to be paved. The large 3,000-gallon petroleum tank is not visible nor are the 10,000 and 15,000-gallon tanks observed in previous aerial photographs adjacent to and northeast of Building No. 5. The substation pad site is clearly visible southwest of Building No. 5 and a drainage ditch running down to the river's edge appears to emanate from the southeast end of Building No. 4. An additional large building pad is visible north of Building No. 2 adjacent to Depot Street. There is also a large unknown rectangular object on the concrete pad adjacent to and north of Building No. 4 as well as a smaller square structure at the location of the current underground holding tanks. The small electrical transformer pad is not visible adjacent to and south of Building No. 4.

The adjacent surrounding properties appear essentially unchanged from previous aerial photographs with the following exceptions. The adjacent northeastern outparcel is developed with only one building (the smaller portion of the L-shaped building observed previously). There are a number of large square objects within the southern portion of this outparcel as previously observed and approximately 50 to 60 automobiles parked within the property. Also clearly visible in the northern adjacent undeveloped track of land across Depot Street is a large south drainage ditch terminating at Depot Street. According to Mr. Crawford this drainage ditch flows into an underground culvert constructed under the subject property and Building No. 4 and terminates in the Presumpscot River. However the outfall was not visible at the time of our site reconnaissance. The southern adjacent Hydroelectric Plant building is not visible in this photograph and only the dam structure appears to be in place.

The 2 June 1953 aerial (with a scale of 1 in. = 2,640 ft.) shows the subject property developed as observed in previous aerial photographs with the following exceptions. There is a large rectangular extension of Building No. 1 along the Presumpscot River extending west of the main building towards Route No. 202 as well as a large rectangular extension of Building No. 2 northward towards Depot Street. There is a large stand of trees visible in the western quarter of the subject property adjacent to the northwestern outparcel and Route 202 which obstructs the view of this area. There are no structures visible in the area of the old garage however there is a circular drive extending out into this section of the subject property. There

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number of small square objects located along the edge of the property line separating the Maine Central Railroad and the subject property which are unknown and the above-ground fuel tanks observed during our site reconnaissance are not visible in this aerial photograph.

The adjacent northeastern outparcel does not appear as intensively developed as observed in previous aerial photographs. It contains two small unknown structures. The remaining portions of the subject property and surrounding adjacent properties appear essentially unchanged from previous aerial photographs. However due to the scale of this aerial photograph much of the detail visible in previous aerial photographs is not visible.

An undated oblique aerial photograph provided by Mr. Keddy, view the subject property north-northeast from across the Presumpscot River. It shows the site developed as observed in the 1962 aerial photograph. There is a small low roof structure off the south side of Building No. 5 in the current location of Building No. 6. There is also a small sandbar in the Presumpscot River downhill from the substation site. There are no visible signs of an outfall along the southern side of Building No. 4.

Interviews: Based on our conversation with Mr. Lawrence Keddy and Mr. Bruce Crawford at the time of our site reconnaissance the subject property was the site of a paper mill during the early to mid-1900's. Then during the early 1960's for a short period the site was occupied by the Maine Steel Company who manufactured steel buckets for loaders and heavy equipment. The site was then occupied between the late 1960's and early 1970's by Grinnell Corporation, a subsidiary of ITT. Grinnell Corporation manufactured sprinkler pipe materials within the subject building. Then during the mid 1970's the site was occupied by Park Corporation a heavy equipment liquidator who was responsible for selling most of the heavy equipment previously owned by Grinnell Corporation. And finally the site was occupied by National Metal Converters of Windham (aka New England Steel Company) between 1975 and 1978 when Mr. Keddy took possession of the property.

Regulatory Record Review: Based on our review of the CERCLIS (Hazardous Waste Discharges) list and RCRA (Hazardous Waste Generator) list published by the U.S. EPA for the State of Maine (9 and 10 February 1993) the subject property is not currently listed. However the northern adjacent property across Depot Street is the site of New England Antigenetics listed as a small quantity generator. Small quantity generators are producers who generate 100 kilograms per month but less than 1,000 kilograms per month of non-acutely hazardous waste.

Based on our review of the Maine Department of Environmental Protection (MDEP) spill report list dated 10 February 1993 neither the subject site nor the adjacent surrounding properties have had reported on-site petroleum releases.

Based on our review of the MDEP Bureau of Oil and Hazardous Materials Control Division list of all locations reported, there are no listed discharges within or in the vicinity of the subject property.

At the request of Mr. Lawrence J. Keddy our regulatory record review did not include direct contact with MDEP relative to the subject property, the adjacent Depot Energy Company or New England Antigenetics.

III. POTENTIAL SITE CONTAMINATION:

Lead Based Paints: A review of the subject facilities relative to potential sources of lead based paints (LBP's) was not conducted since current state and federal regulations addressed LBP'S only in commercial building where exposure to children is possible (e.g. schools and daycare centers).

Asbestos Containing Materials: Under the clean air act of 1970 the EPA has been regulating many asbestos containing materials (ACM'S) which by EPA definition are materials which have more than one percent asbestos. In the mid-seventies, several major kinds of asbestos containing materials, such as spray applied insulation, fireproofing and acoustical surface materials were banned by the EPA because of growing concern of health effects (particularly cancer) associated with exposure to such materials.

Based on information obtained during this assessment regarding the age of the subject facility a review of the potential asbestos containing materials is considered necessary.

A number of areas of concern relative to potential asbestos containing materials were observed during our site reconnaissance. Specifically visibly friable steam line insulation throughout Building No. 4, acoustical ceiling tile in Building No. 1 and resilient flooring. Transit panel roofing in Building No. 6.

This limited asbestos survey is intended as an assessment of the current accessible and visible interior materials of the subject facility and is based on the current condition and suspected age of the materials. It is not an inspection, sampling and testing program designed to account for all potential asbestos containing materials within the subject facility. Furthermore it does not address potential asbestos containing materials within site machinery, equipment, generators, furnaces, holding tanks, and so forth.

We recommend that a comprehensive asbestos inspection and testing program be implemented within the subject facility and on-site equipment and machinery.

IV. CONCLUSIONS:

The subject site is currently developed as a large industrial facility as detailed in Figure No. 2. A portion of the facility is currently utilized as a machine shop. The subject property was developed in the early 1900's as a paper mill and during its lifetime has been utilized as a steel mill and forging shop, manufacturing steel sprinkler pipes, heavy equipment parts and concrete reinforcing steel.

Based on our observations during our site reconnaissance, our review of city records, regulatory agency lists, historical aerial photographs and site interviews there is potential concern of site soil contamination that may require remediation.

Furthermore there are a number of areas of concern within and in the vicinity of the subject property that would require more detailed investigation relative to their potential for surficial and subsurface contamination of the subject property.

1. Based on our conversations with Mr. Keddy and Mr. Crawford there is known petroleum contamination around the 10,000-gallon above-ground petroleum tank. However due to snow cover the area was not visible at the time of our site visit.
2. The location and condition of the fuel lines from the above-ground 10,000 and 15,000-gallon fuel tanks is unknown. Further investigation of their location and condition is recommended.
3. A garage building existed in the 1970's in the southeastern quarter of the subject property. Further inspection as well as subsurface investigation is recommended relative to activities in this area.

4. The old substation pad and transformer pad adjacent to Buildings Nos. 5 and 6 require further inspection and subsurface investigation relative to potential contamination from Polychlorinated Biphenyls (PCB's).
5. The 10,000-gallon and 15,000-gallon above-ground fuel tanks were not observed in the 1953 and 1962 aerial photographs, and the source of fuel for the subject site then is unknown. Furthermore it is believed that the coal burning plant (Building No. 3) was not operational during this period. We recommend further investigation into the source of fuel utilized during this period and the location of fuel storage.
6. An unknown structure observed in the 1962 aerial photograph adjacent to and north of Building No. 4 requires further inspection and subsurface investigation relative to potential sources of contamination and underground structures.
7. The outfall location of the large floor drain observed in the basement area of Building No. 4 is unknown. Further investigation is required.
8. Access to Building No. 3 was not possible due to the collapse of the roof and extensive snow cover within the facility. A complete walk-through of this portion of the subject property as well as the remaining snow covered areas of the site is recommended once the snow cover has melted.
9. A complete regulatory record review of the nearby Depot Energy Company site and New England Antigenetic site is recommended.

V. CLOSURE:

This review has been performed for your use in connection with the property on Maine State Route No. 202 in South Windham, Maine. The conclusions of Consla Geotechnical Engineering, Inc. are based upon the scope of work described herein and the referenced sources of information in accordance with generally accepted environmental engineering practice. Any additional pertinent information which becomes available concerning this site should be provided to CGE for review in order that our conclusions can be revised as necessary.

Thank you for selecting us to perform this study. If you should have any questions or require additional information, please contact us.

Sincerely yours,
Consla Geotechnical Engineering, Inc.

Keith A. Wallace
Staff Engineer

John A. Consla (KS)
John A. Consla, P.E.
President

Enclosures: Fig. No. 1 - U.S.G.S. Quadrangle Map
 Fig. No. 2 - General Site Plan

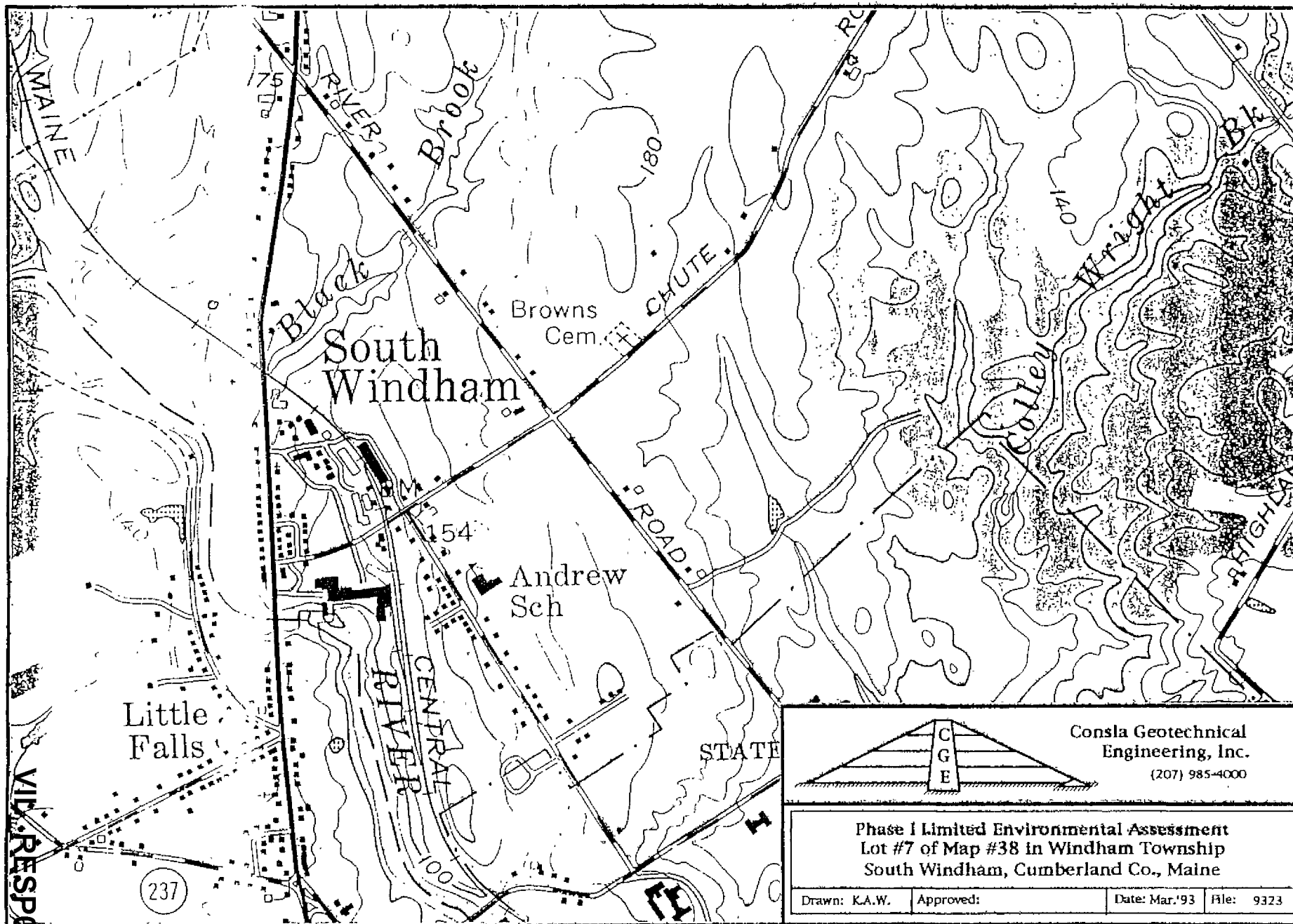


Figure No. 1

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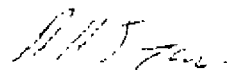
PHASE I ENVIRONMENTAL SITE ASSESSMENT
KEDDY MANUFACTURING COMPANY
SOUTH WINDHAM, MAINE

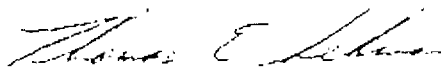
Submitted to:
Merritt Technologies Corporation
2213 M Street NW, Suite 300
Washington, DC 20037

Submitted by:
Acadia Environmental Technology
4 Milk Street
Portland, Maine 04101

March 2, 1994

Prepared by


Alison H. Jones
Hydrogeologist


Thomas F. Schwarm, CG
President-Hydrogeologist



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March 2, 1994

Kelly Hattel
Merritt Technologies Corporation
2213 M Street NW, Suite 300
Washington, DC 20037

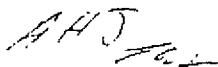
RE: Phase I Environmental Site Assessment Report
Keddy Manufacturing Company
South Windham, Maine

Dear Ms. Hattel

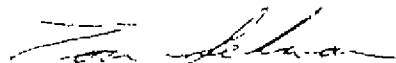
Acadia Environmental Technology prepared this report of the Phase I environmental site assessment of Keddy Manufacturing in South Windham, Maine. Enclosed please find an original of the report, and one copy. Please feel free to call us if you should have any questions.

Acadia appreciates working with you on this project.

Sincerely,



Alison H. Jones
Hydrogeologist



Thomas E. Schwarm, CG
President-Hydrogeologist

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Introduction

Purpose

Acadia Environmental Technology (Acadia) was retained by Merritt Technologies, Inc (Merritt) to conduct this Phase I environmental site assessment of the Keddy Manufacturing Facility at 7 Depot Street in South Windham, Maine. The objective of this assessment is to evaluate the presence, or the likelihood of the presence, of environmental concerns that could pose liabilities to a future owner.

Limiting Conditions

This assessment was conducted under adverse winter conditions. Virtually all of the buildings were unheated. Water leaking from the roofs had frozen on many of the floors and walls. Walking was hazardous and not all areas were accessible. Generally, there were no operating lights in the buildings. The former boiler building, which had collapsed, was unsafe to enter. Its interior was covered with snow which hid the contents. More than one foot of snow covered the site during the entire investigation period. Almost all of the ground surface could not be inspected for stained soil, stressed vegetation, or other evidence of disposal of liquid or solid waste.

Acadia performed this Phase I environmental site assessment in a professional manner using that degree of skill and care exercised for similar projects under similar conditions by reputable and competent environmental consultants in Maine. Acadia shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed to it at the time the investigation was performed. The conclusions presented in this Report were based solely upon the services described, which were performed within the time and budgetary constraints imposed by the customer.

This report shall not be construed to create any warranty of representation that the real property of which the investigation was conducted is free of pollution or complies with any or all applicable regulatory or statutory requirement, or that the property is fit for any particular purpose. No third party is entitled to rely upon any information or opinions contained in this report.

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Scope of Work

The scope of work of this Phase 1 site assessment included:

- Background research, including review of Maine Department of Environmental Protection (DEP) records and Sanborn maps.
- Interviews with people who have knowledge of the property, including town officials and representatives of the owner.
- Site walkover to view and photograph items that may be of environmental concern.
- An additional site visit for follow-up observation.
- Preparation of this report.

Site Description

Location and Legal Description

The Keddy Manufacturing Facility is located in South Windham, Maine at 7 Depot Street near the intersection of Route 202 and Depot Road. The property is specified as Lot 7 of Map 38 on the Windham tax assessors maps as shown in Figure 1.

Site and Vicinity Characteristics

The Keddy facility is located in a small town with mixed land uses. Zoning in the area includes industrial, medium-density residential, and general shoreland development zones. The town has public water. Public sewer is also available. The Presumpscot River runs through the town adjacent to the Keddy property (topographic map, Figure 2).

The Keddy property has frontage on Route 202 and Depot Street, it encompasses approximately 85 acres. Buildings at the site comprise approximately 90,000 square feet on several levels (figure 3). One side of lot is adjacent to the Presumpscot River and the building extends over the river in some locations. This river is classified as Class C by the DEP. The Keddy property is zoned for industrial use.

The public sewer system runs in front of the facility near Main Street. However, the facility has not been hooked up to the sewer system to date. Two 1000 gallon underground concrete sewerage holding tanks have been and are still being used. The buildings are heated by oil-fueled boilers. There is no cooling system.

There are gravel roads and parking areas on the Keddy property. Their approximate locations are indicated on Figure 3. In addition, a railroad track crosses the back of the property behind building 5 and 6.

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Information reported by user regarding environmental liens or specialized knowledge or experience

No information of previous environmental problem, hazardous waste disposal, leaking tanks, lead paint or asbestos use was reported by the owner's representative

Current uses of property

The property has been leased by the Barnard Marquit Corporation, a steel foundry company, since 1978, however the company has never had any operations at this site. Barnard Marquit obtained a Waste Discharge License from the Maine DEP on June 18, 1987 for 0.56 million gallons of non-contact cooling water per day (Appendix A). However, the owner's representatives and the monitoring reports indicate that there has been no discharge from the facility.

A machine shop is currently operating in building 1 on the ground level. This shop is operated by the Cumberland Corporation (owned by Mr. Keddy) for repair and maintenance of his other properties. The machine shop uses fuel oil, kerosene, water-soluble cutting oil, paint, and small quantities of other chemicals. Waste oil is taken to a garage where it is burned.

Background Information

Past uses of property

The Keddy property has been used primarily for wood, wood pulp, and paper for a variety of industries. The Sanborn maps show that the mill was built in different stages. The initial buildings are shown on the 1885 map. The layout of the existing buildings is consistent with paper mill use. The 1934 Sanborn map (Appendix B) shows the most buildings. Some buildings and tanks shown on the maps are no longer present.

The following chronology was compiled from Sanborn maps and information provided by Ann Googins, who represented the owner, Mr. Keddy

Pre-1885-Apr 4, 1900 Sebago Wood Board Co

July 25, 1913	Dam Height Agreement E.I. DuPont Demours Powder Co. and Androscoggin Pulp Co
March 29, 1917	From Cora E. Libby to Androscoggin Pulp Co.
May 1, 1917	Fiske Warren, Cornelia Warren, & William Dunbar, Residuary Trustees to Androscoggin Pulp Co.
September 8, 1919	From William H. Bickford to Androscoggin Pulp Co
March 7, 1940	Robert Gair Co., Inc. to Cumberland Securities Corp.
April 29, 1941	Sewer right of way to Julia L. Siciliano
October 6, 1944	Right of way to Central Maine Power
June 25, 1945	Indenture--Cumberland Securities to Windham Fibres, Inc.
January 29, 1954	Indenture portion--Cumberland Securities to Atlantic Mills
August 19, 1954	Indenture portion--Irving Fox et al to Atlantic Mills, Inc
June 6, 1961	Atlantic Mills, Inc. to Keddy Manufacturing Co.
October 30, 1961	Quit-claim deed--Atlantic Mills, Inc. to Lawrence J. Keddy
October 17, 1969	Keddy Manufacturing to Grinnell Corp.
August 21, 1973	ITT Grinnell Corp. to Park Corp
May 9, 1974	Park Corp. to Lawrence J. Keddy
January 3, 1975	Mortgage and Security Agreement--National Metal Converters of Windham, Inc
January 17, 1978	Lawrence J. Keddy takes back property

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Manufacturing of wood pulp and box board was the primary activity at the site from before 1885 until about 1940 when Sebago and Androscoggin Pulp and Paper operated the facility. As part of their activities, the Sanborn maps show there was a machine shop at the site as well as coal and oil storage. Sanborn maps from 1922 to 1944 indicate that two large fuel oil storage tanks (150,000 and 250,000 gallons) were located on the property near Depot Street.

Cumberland Securities operated the facility as a box board mill, according to the 1944 Sanborn Map. The use is unclear from 1944 until Keddy bought it in 1961. Apparently Maine Steel fabricated snowplow blades at the site sometime during this period. According to Ann Googins, Baker Refrigeration and Bluestein operated at the site. We were unable to determine when these businesses operated or what they did. Keddy installed metal working equipment for steel melting and forging. According to the owner's representative, they made pipe flanges by induction melting and drop forging. Machining of the flanges was done at an out-of-state facility. Grinnell (later acquired by ITT) bought the facility and product line in 1969.

According to the Sanborn maps, a railroad track crossed the back of the property for much of its history. A railroad spur also wrapped around the building.

In 1975, National Metal Converters operated a rolling mill and made rebar for concrete at the site. They eventually became New England Steel. The company went out of business in 1978 and Keddy took back the property, leasing it to Barnard-Marquit. Barnard-Marquit has never used the facility.

The paper and steel forging industries generally use a wide variety of chemicals in their day-to-day activities. A list of chemicals associated with these uses is in Appendix C.

Adjoining properties

**Table I:
Current Abutters and Property Uses**

Abutter	Map/Lot	Property Use
Jean Winslow	37/4B	residential
Mary and Lester Coulombe	37/12	residential
Walter and Sandra Thorpe	37/13	residential
Janet Foster	37/20	residential
Merrill Laskey	37/21	residential
Merrill Laskey	38/3	residential
Marjorie Drost	38/5	residential
Merrill Laskey	38/6	Energy Depot--coal storage/sales former train station
Wm & Patricia Dillios	38/8	residential
"	38/9	Corner store
S. Windham Fire Dept	38/12	Fire House
Scott Paper	38/10,11	Hydroelectric Dam
Richard Rogers	38/48	Commercial
Richard Pierce	38/41	Commercial
Depot Street Condominiums	38/49D	offices, formerly owned by L.C. Andrew lumber mill
VA Regional Loan Guarantee Division	38/39	Commercial
Charles Dickenson	38/40	Commercial

The L.C. Andrew's lumber mill is shown on the 1922 Sanborn map as a wood planing and box mill. On the later maps a milling and lumber yard is indicated. The yard was called and we were told that only sawing and milling operations were conducted

At Energy Depot, a 500-gallon underground gasoline tank was removed in the fall of 1993. Some oil was observed in the hole. The DEP has not required any investigation or cleanup. This facility was used for coal and oil storage. There may have been a vehicle repair garage at the site. There is little current activity at the site.

Public Information Search Results

Acadia conducted a file search at the DEP to determine if there had been any reported hazardous waste or petroleum spills or investigations at the site. No records pertaining to this property were found. There were no references to the property under the US EPA Hazardous Waste Handler's List. There were no registered underground petroleum tanks or records of tank removals at the site, according to the State's tank listing.

Information from Site Reconnaissance

Acadia visited the site twice. During the initial visit on February 9, 1994, Bruce Crawford and Ann Googins were interviewed regarding the site history. The buildings, with the exception of the boiler room were walked through. During a second visit on February 22, the buildings were walked through again and the property outside was walked. No compounds were detected in any of these locations.

The buildings are primarily of concrete construction with steel and plastic roofing. There were many roof leaks which resulted in ice on the walls and floors. There were many pieces of heavy equipment including metal furnaces, pulp tanks, rolling mills, presses, and boilers. The buildings are huge with high ceilings and extensive basements. The owner's representatives guided us through the whole complex since it would have been difficult for an outsider to find all the rooms and buildings. During the first visit travel was extremely difficult because of the extensive ice in the buildings and the extreme cold. The second visit was on an unusually warm day. During that visit the snow on the leaky roofs was melting so it was essentially raining inside. Water had pooled on the icy floors. A Photovac photoionization detector (PID) with a 10.6 eV lamp was used to test for volatile organic compounds in the floor drains. No chemicals were detected. Most of the floor drains were in the area of the mill that is over the water. It is likely that most waste liquids in the past were discharged through these drains directly into the river. For many years, two 1,000-gallon underground concrete holding tanks have been used to store waste water. These are pumped out periodically. If these tanks leaked, they could have released some industrial chemicals into the soil.

The property outside the building was covered with more than a foot of snow during both visits. At the time of the second visit, the snow had melted on some of the south-facing slopes along the river. In these areas metal slag, rusted drums, metal scrap, and what may have been gasket material (possibly containing asbestos) was found. Considering the small amount of soil that was exposed, it was surprising how much trash was seen. This may be indicative of generally poor waste handling practices. Soil samples were collected and analyzed in this area, no chemicals were detected. An abandoned sewer line was identified on the property. Water was discharging from it but there was no odor and the PID did not detect any chemicals.

Acadia observed the following:

- Piles of metal slag, rusted drums, and other metal waste that appear to be associated with the mill were observed on site and on the adjoining Scott Paper property. Considering how much snow was present, it was surprising how much debris was found.
- Possible asbestos-containing materials (ACM's) are present at the site. These include refractory materials, refractory brick, furnace mortar material, dust from refractory

materials, pipe insulation, and exterior siding. The use of this site is consistent with the widespread use of asbestos

- Peeling paint is prevalent. It is likely that some of the paint contains lead and may need special handling and disposal
- Two large reportedly concrete sewerage holding tanks were reported
- There are numerous small containers of oil, paint, and solvents
- There is a substantial electrical power infrastructure at this site. Many transformers were seen. Most of these appear to be dry so they would not contain PCBs. There was one wet transformer (see photos, Appendix D) and there may be others that were not seen. These may require testing, and if they contain PCBs, special disposal
- There are two 10,000-gallon above-ground fuel oil storage tanks adjacent to the railroad tracks behind the building. These were apparently used to store heavy oil. These are no longer in use. There is some spilled oil, which looks like asphalt, under the tanks.
- There is a 275-gallon heating oil tank in use in the machine shop.
- There is a 3000-gallon above-ground fuel oil tank outside of the building (see photos). This tank was used for starting the boiler that is not currently used.
- Oil is stored in a 55-gallon drum on the ground level of building 1 for heating the front offices.
- There is a milk tank that was reportedly never used

Information from Interviews

Acadia interviewed Roger Timmons, the Code Enforcement officer of Windham, Maine on February 11, 1994. Mr. Timmons was not familiar with the operations of the mill or chemicals used at the site. He did remember slabs from old buildings at the site that are now gone, possibly the old machine shop shown on the Sanborn maps. Acadia could not find these slabs because of snow cover. He mentioned that a sewer discharge line used to run through the property from the residential area and the school to the east. This line was never removed. Acadia found a drainage line that could have been that sewer line. He noted that there was heavy truck traffic on the north side of the building near Depot Road. He recommended that the ground surface be inspected for staining.

Charles Hammond, the Chief of Fire and Rescue, Windham Fire Department, was interviewed on February 10. He recalled an oil tank in the boiler room that was exposed when the building started to collapse. He did not know if it was still there. He did not know about chemical use at the site.

VIL_RESP00202

Conclusions and Recommendations

Based on direct observations, interviews, and background research, Acadia concludes the following:

- The types of businesses that have operated at the site traditionally use a variety of chemicals in their routine operations (Appendix C). While Acadia could not document use of chemicals other than fuel oil and refractory materials, it is likely that a variety of chemicals were used at the site during the past century. Most waste was probably discharged into the river, but it is possible that some may have been disposed of on the property.
- Acadia observed possible asbestos-containing materials (ACM's) at the site. Among the possible ACM's are: pipe wrap, bags of refractory materials, furnace brick and mortar, dust from refractory and furnace materials, and exterior siding. We recommend retaining a company to do a thorough asbestos assessment.
- Even though most of the site was covered by one foot of snow, we observed scrap steel, slag, and rusted drums in several places. We expect to see more waste materials when the snow melts. The amount of trash suggests poor waste handling practices, which may indicate that other materials were disposed of on site. If petroleum, ACM, solvents, or other chemicals were discarded on site, clean up may be required. Refuse along the stream bank may need to be removed to comply with State laws. Some of this refuse is located on the adjacent S.D. Warren property, but the material appears to be from the steel mill. This may constitute a liability.
- There is evidence of oil spillage near the two 10,000 gallon oil tanks. Some soil removal may be necessary in this area.
- Large areas of peeling paint were observed. If this paint contains lead, special handling and disposal may be necessary that could increase rehabilitation costs. There may be lead-paint dust in the building from paint degradation or previous removal. We recommended paint evaluation by a qualified consultant to determine if costly remediation will be necessary.
- There are numerous small containers of oil, paint, and solvents that should be removed by the current owners before the sale is completed. Most of these containers are in the machine shop and are currently in use.
- This property has heavy duty electrical service. Many transformers were observed that the owner's representative told us were dry, so they should not contain PCBs. There is one transformer (not in use) in the building which may be wet and could possibly contain PCBs. This transformer should be removed by the current owner. The current owner should retain responsibility for any wet transformers found at the site.

- Sanborn maps indicate that there were very large oil storage tanks on the Depot Road side of the mill. The maps also show that there was a machine shop near the corner of Depot and Main Streets. These areas are now covered with snow, and should be inspected for oil and chemical releases after the snow melts.
- The mill's waste water is stored in two 1,000-gallon underground concrete tanks. These tanks are pumped out periodically. These tanks and their supply lines may have released oil, solvents, or other chemicals into the soil.
- There may be petroleum in the soil near the old fuel tank locations on Depot Road, near the existing 10,000 gallon tanks, near the 3000 gallon tank, or near the old machine shop.

Based on the historical site use, materials observed at the site, and the evidence of poor waste handling, Acadia recommends further investigation of this site to evaluate the potential cleanup costs that may be incurred to comply with State and Federal regulations. This investigation work should be conducted after the snow melts and the ground surface is visible.

On the positive side, because this mill is so close to the river (it is over the river in some places), most liquid wastes were probably discharged directly into the river. We observed many floor drains that emptied directly into the river.

Keddy Mill PCB Sampling Results

	Units	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	SS-10	SS-11	SS-12	SS-13	SS-14	SS-15
Depth		0-6"	6-12"	12-18"	0-6"	6-12"	12-18"	0-6"	6-12"	6-12"	0-6"	0-6"	0-6"	0-6"	6-12"	12-18"
Location		Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room	Generator Room
Arochlor-1016	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1221	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1232	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1242	ug/Kg	6760	43200	27200	35600	11200	7410	118000	36000	110000	81700	51300	61500	121000	21800	20300
Arochlor-1248	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1254	ug/Kg	2280	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1260	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

	Units	SS-16	SS-17	SS-18	SS-19	SS-20	SS-23	SS-24	SS-25	SS-26	SS-27	SS-28	SS-29	SS-30
Depth		0-6"	6-12"	0-6"	6-12"	0-6"	0-6"	6-12"	6-12"	0-6"	0-6"	0-6"	0-6"	0-6"
Location		Near Concrete Ramp in Basement	Near Concrete Ramp in Basement	Near Concrete Ramp in Basement	Near Concrete Ramp in Basement	Near Concrete Ramp in Basement	Right Hand Pile - First Floor	Right Hand Pile - First Floor	Right Hand Pile - First Floor	Left Hand Pile - First Floor	Left Hand Pile - First Floor	Left Hand Pile - First Floor	Left Hand Pile - First Floor	Left Hand Pile - First Floor
Arochlor-1016	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1221	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1232	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1242	ug/Kg	8140	1390	5320	ND	41800	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1248	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Arochlor-1254	ug/Kg	4780	2150	3930	14000	27500	71	26	ND	869	332	509	658	ND
Arochlor-1260	ug/Kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Notes:

SS-21 is a duplicate of SS-20.

SS-25 is a duplicate of SS-24.

All samples collected with a pre-cleaned sampling device.

BP Environmental, Inc.
Phone: (410) 745-0919
Fax: (410) 745-0922

Table
Groundwater Analytical Results
Legend
GFM-101-
16 of 16

Legend

Groundwater Standards are the MDE Interim Final Guidance dated 8/01, Table 1 for Type I and Type II Aquifers

Analytical Results are in mg/L

BDL = Below Detection Limits

Exceedances of MDE Interim Standards are bolded.

NA=Not Applicable; =Not Analyzed

NS = No Standard

U = ND (Not Detected)

Not all 8260 analytes are listed; only primary VOCs or detected chlorinated organics are shown

* Due to laboratory accident, certain wells had to be re-sampled.

VIL-RES-00206



May 19, 2010

Environmental Projects Inc.
Attn: Brian Fonz
PO Box 1417
Auburn, ME 04211

Dear Mr. Fonz,

AmeriTech Environmental Services, Inc., is a multi-state licensed hazardous waste transporter and is prepared legally to transport PCB remediation waste from Keddy Mill Site, South Windham, ME to CWM, Model City, NY.

Our Maine Hazardous Waste Transporter license number is ME-HWT-417 and our New York Part 364 Permit number is ME-017.

Should you have any additional questions I can be reached at 207-438-9149.

Sincerely,

Oscar Wilkins
Vice President



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE & WASTE OIL TRANSPORTER LICENSE

JOHN ELIAS BALDACCI
GOVERNOR

EFFECTIVE DATE 02/02/2010

DAVID P. LITTELL
COMMISSIONER

EXPIRES 02/02/2011

License No.
ME - HWT - 417
ME - WOT - 115

AMERITECH ENVIRONMENTAL SVC.
Name of Licensee

PO BOX 539, ELIOT, ME 03903
Licensee Address

is hereby granted a Hazardous Waste & Waste Oil Transporter License from the State of Maine, Department of Environmental Protection pursuant to the provisions of Title 38, MRSA § 1303-A, and Chapter 853, Section 4 (for hazardous waste) and Chapter 860, Section 9 (for waste oil) of the Department's rules. The licensee(s) shall comply with applicable Department of Environmental Protection rules, including standard conditions set forth in Chapter 853, Section 8 and Chapter 860, Section 9 and the following special conditions:

1. The above named licensee shall notify the Department of Environmental Protection, in writing, of any change, including renewal, made to liability insurance coverage within ten days of the change.
2. The licensee shall comply with all Federal operation and safety standards and regulations as listed in Title 49, Code of Federal Regulations, including, but not limited to, the Federal Motor Carrier Safety Regulations listed in 49 C.F.R. Parts 390-397.
3. The licensee shall file all applicable reports with the Department and pay all applicable fees in accordance with the requirements of Chapter 860, Sections 13-15 and 38 M.R.S.A. Section 1319-I and rules and procedures adopted thereunder.
4. The Department, as it deems necessary for the effective management of hazardous waste may require transporters to furnish reports of records concerning quantities and handling of wastes identified or listed in Chapter 850 of the Department's rules.
5. The licensee shall not operate as a transfer facility, or store hazardous waste for more than one day on weekdays, three days over weekends, or four days over holiday weekends (associated with a Friday or Monday holiday), without a transfer facility license, pursuant to the rules, Chap. 856, Sec. 11A(3).
6. The licensee shall not operate as a storage facility or store hazardous waste for more than ten (10) days without a storage facility license, pursuant to the rules, Chap. 856, Sec. 10H.
7. This license shall not prohibit the Department from seeking enforcement of violations at the facility.
8. If no activity has occurred during the quarterly report period, the licensee shall so designate the lack of activity on the report form and forward it to the Department.

Given under our hand and seal the 19th day of JANUARY, 2010.

BY: _____

TITLE: MARK HYLAND, Bureau Director BRWM

Related Hazardous Waste & Waste Oil Transporter licenses (operators and conveyances), if any:
See Attached Sheet.

H/BOHMC/DMU/HAZ-WASTE OIL

AUGUSTA
17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR
106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND
312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE
1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 760-3143



PART 364
WASTE TRANSPORTER PERMIT NO. ME-017

Pursuant to Article 27, Titles 3 and 15 of the Environmental Conservation Law and 6 NYCRR 364

PERMIT ISSUED TO:

AMERITECH ENVIRONMENTAL SERVICES, INC.
P.O. BOX 539
ELIOT, ME 03903

PERMIT TYPE:

☐ NEW
☐ RENEWAL
☒ MODIFICATION

CONTACT NAME: OSCAR WILKINS
COUNTY: OUT OF STATE
TELEPHONE NO: (207)438-9149

EFFECTIVE DATE: 05/12/2010
EXPIRATION DATE: 06/30/2010
US EPA ID NUMBER: MER000500595

AUTHORIZED VEHICLES:

The Permittee is Authorized to Operate the Following Vehicles to Transport Waste:

(Vehicles enclosed in <>'s are authorized to haul Residential Raw Sewage and/or Septage only)

46 (Forty Six) Permitted Vehicle(s)

MA 62463
MA SM10209
MA SM10242
MA SM11107
MA SM11108
MA SM11742
MA SM1186
MA SM11867
MA SM62463
MA SM71143
MA SM78242
MA SM83158
MA SM83262
MA SM87081
ME 0968800
ME 1178742
ME 951763
ME 952747
ME 952889
ME 954291
ME 954466
ME A290125
ME A367863
ME A519294
ME A560906
ME A561077
ME A599557
ME A599568
ME A599569
ME A599570
ME A599571
ME A599572
ME A654723
ME A654799
ME A689026
ME A720965
ME A849590
ME A858992
ME A858993
ME A921851
ME A921852
ME A921853
ME A952162
ME A952163
ME A952195

ME B260107
End of List



PART 364
WASTE TRANSPORTER PERMIT NO. ME-017

Pursuant to Article 27, Titles 3 and 15 of the Environmental Conservation Law and 6 NYCRR 364

PERMIT ISSUED TO:

AMERITECH ENVIRONMENTAL SERVICES, INC.
P.O. BOX 539
ELIOT, ME 03903

PERMIT TYPE:

☐ NEW
☐ RENEWAL
☒ MODIFICATION

CONTACT NAME: OSCAR WILKINS
COUNTY: OUT OF STATE
TELEPHONE NO: (207)438-9149

EFFECTIVE DATE: 05/12/2010
EXPIRATION DATE: 06/30/2010
US EPA ID NUMBER: MER000500595

AUTHORIZED WASTE TYPES BY DESTINATION FACILITY:

The Permittee is Authorized to Transport the Following Waste Type(s) to the Destination Facility listed :

Destination Facility	Location	Waste Type(s)
Chemung County Sanitary Landfill	Chemung , NY	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil
CWM CHEMICAL SERVICES LLC	MODEL CITY , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Hazardous Industrial/Commercial
ENVIRONMENTAL SOIL MANAGEMENT INC	LOUDON , NH	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil
GREENWOOD STREET LANDFILL	WORCESTER , MA	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil
SOUTHBRIDGE SANITARY LANDFILL	SOUTHBRIDGE , MA	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil

NOTE: By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the Environmental Conservation Law, all applicable regulations, and the General Conditions printed on the back of this page.

ADDRESS:

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials - Waste Transporter Program
625 Broadway, 9th Floor
Albany, NY 12233-7253

AUTHORIZED SIGNATURE:

Date: 5/12/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Oscar Wilkins
Robert Delhome
P.O. Box 539
Eliot, ME 03903

(7404)
August 15, 2002
6934

Subject: Notification of PCB Activity

Thank you for filing the Notification of PCB Activity form dated July 5, 2002 for the facility location listed below:

AmeriTech Environmental Services, Inc.
93 Dow Highway
Eliot, ME 03903-

Please be advised that the EPA Identification Number for the above facility is correctly stated on your form as MER000500595. This is the number you will use for reporting PCB activity.

If you have any questions regarding the accuracy of the EPA ID number, please call Laura Casey at (202) 566 -1982.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Baney", with a stylized flourish underneath.

Tony Baney, Chief
Fibers & Organics Branch

VIL_RESP00211



CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
Model City, NY 14107
(716) 286-1550
(716) 286-0211 Fax

HRC VILLAGE AT LITTLE FALLS
ATTN: ENVIRONMENTAL COMPLIANCE DEPT.
MEP000018529
7 DEPOT ST
WINDHAM ME 04062

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from HRC VILLAGE AT LITTLE FALLS on 06/25/10 as described on Shipping Document number 003974028JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY300769
CWM Tracking ID: 8164050501
CWM Unit #: 1*0
Disposal Date: 06/25/10

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 339269
06/28/10

For questions please call
our Customer Service Dept.
at (800) 843-3604

VIL_RESP00212

From everyday collection to environmental protection, Think Green® Think Waste Management.



CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
Model City, NY 14107
(716) 286-1550
(716) 286-0211 Fax

HRC VILLAGE AT LITTLE FALLS
ATTN: ENVIRONMENTAL COMPLIANCE DEPT.
MEP000018529
7 DEPOT ST
WINDHAM ME 04062

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from HRC VILLAGE AT LITTLE FALLS on 06/25/10 as described on Shipping Document number 003974029JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY300769
CWM Tracking ID: 8164050601
CWM Unit #: 1*0
Disposal Date: 06/25/10

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 339270
06/28/10

For questions please call
our Customer Service Dept.
at (800) 843-3604

VIL_RESP00213

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CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
Model City, NY 14107
(716) 286-1550
(716) 286-0211 Fax

HRC VILLAGE AT LITTLE FALLS
ATTN: ENVIRONMENTAL COMPLIANCE DEPT.
MEP000018529
7 DEPOT ST
WINDHAM ME 04062

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from HRC VILLAGE AT LITTLE FALLS on 06/25/10 as described on Shipping Document number 003974027JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY300769
CWM Tracking ID: 8164050801
CWM Unit #: 1*0
Disposal Date: 06/25/10

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 339271
06/28/10

For questions please call
our Customer Service Dept.
at (800) 843-3604

VIL_RESP00214

From everyday collection to environmental protection, Think Green® Think Waste Management.



CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
Model City, NY 14107
(716) 286-1550
(716) 286-0211 Fax

HRC VILLAGE AT LITTLE FALLS
ATTN: ENVIRONMENTAL COMPLIANCE DEPT.
MEP000018529
7 DEPOT ST
WINDHAM ME 04062

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from HRC VILLAGE AT LITTLE FALLS on 06/29/10 as described on Shipping Document number 003974035JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY300769
CWM Tracking ID: 8164054301
CWM Unit #: 1*0
Disposal Date: 06/29/10

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 339298
06/30/10

For questions please call
our Customer Service Dept.
at (800) 843-3604

VIL_RESP00215

From everyday collection to environmental protection, Think Green® Think Waste Management.



CWM CHEMICAL SERVICES, LLC

1550 Balmer Road
Model City, NY 14107
(716) 286-1550
(716) 286-0211 Fax

HRC VILLAGE AT LITTLE FALLS
ATTN: ENVIRONMENTAL COMPLIANCE DEPT.
MEP000018529
7 DEPOT ST
WINDHAM ME 04062

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from HRC VILLAGE AT LITTLE FALLS on 06/29/10 as described on Shipping Document number 003974030JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY300769
CWM Tracking ID: 8164054401
CWM Unit #: 1*0
Disposal Date: 06/29/10

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 339299
06/30/10

For questions please call
our Customer Service Dept.
at (800) 843-3604

VIL_RESP00216

From everyday collection to environmental protection, Think Green® Think Waste Management.

**CWM CHEMICAL SERVICES, LLC**

1550 Balmer Road
Model City, NY 14107
(716) 286-1550
(716) 286-0211 Fax

HRC VILLAGE AT LITTLE FALLS
ATTN: ENVIRONMENTAL COMPLIANCE DEPT.
MEP000018529
7 DEPOT ST
WINDHAM ME 04062

CERTIFICATE OF DISPOSAL

CWM CHEMICAL SERVICES, L.L.C., EPA ID: NYD049836679, has received waste material from HRC VILLAGE AT LITTLE FALLS on 06/29/10 as described on Shipping Document number 003974036JJK Sequence number 01. CWM CHEMICAL SERVICES, L.L.C. hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: NY300769
CWM Tracking ID: 8164054501
CWM Unit #: 1*0
Disposal Date: 06/29/10

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MICHAEL D MAHAR
DISTRICT MANAGER
Certificate # 339300
06/30/10

For questions please call
our Customer Service Dept.
at (800) 843-3604

VIL_RESP00217

From everyday collection to environmental protection, Think Green® Think Waste Management.

EP-6374

Please print or type. (Form designed for use on elite (12-pit) paper.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MER000019526	2. Page 1 of 1	3. Emergency Response Phone 877-246-0447	4. Manifest Tracking Number 003974030 JJK			
5. Generator's Name and Mailing Address HRC Villages at Little Falls LLC 100 Commercial St. Portland, ME 04101 Generator's Phone: 207-238-4122			Generator's Site Address (if different than mailing address) 7 Depot St South Windham, ME 04062					
6. Transporter 1 Company Name Patriot			U.S. EPA ID Number MER0000500595					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address Land Transfer Services, LLC 1550 Sunset Road Westport, NY 12187 Facility's Phone: 518-534-3221			U.S. EPA ID Number NY0249336679					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
			No.	Type				
	1.	PC, UN2402, Waste Polyethylene Biphenyls, Solid Material, 9.11	20	2" x 2" CM	EST 1550	KG	4002	6007
	2.							
	3.							
4.								
14. Special Handling Instructions and Additional Information V. 14.001 of 14.001 with RCSE Profile #41500055 911640544 11/11/10 9116407K Out of Service Date 06/15/10								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name Stephen A Etzel			Signature 			Month Day Year 06 28 10		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: Date leaving U.S.:				
	Transporter signature (for exports only):							
DESIGNATED FACILITY	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name Blanca A Sullivan			Signature 			Month Day Year 06 28 10	
	Transporter 2 Printed/Typed Name			Signature			Month Day Year	
18. Discrepancy								
18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Estimated actual 9116407K Manifest Reference Number:								
18b. Alternate Facility (or Generator)						U.S. EPA ID Number		
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H132		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name Robert Klocas			Signature 			Month Day Year 06 29 10		

Form Approved. OMB No. 2050-0039

DESIGNATED FACILITY TO GENERATOR

EP-6374

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MER000000552	2. Page 1 of 1	3. Emergency Response Phone 877-246-7447	4. Manifest Tracking Number 003974035 JJK		
5. Generator's Name and Mailing Address HFC Village at Little Falls LLC 100 Commercial St. Portland, ME 04101 Generator's Phone: 207-338-4122			Generator's Site Address (if different than mailing address) 7 Depot St South Windham, ME 04062				
6. Transporter 1 Company Name Interkash				U.S. EPA ID Number MER000000556			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address CWW Environmental Services, LLC 1850 Sander Road Meadow City, NY 14107 Facility's Phone: 716-754-3231				U.S. EPA ID Number NY0049836673			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes	
		No.	Type				
1	PC, UN1402 Waste Paints and Solvent Mixtures, 3 in 200A(1)	001	2 in	EST 15000	K	W002	800
2							
3							
4							
14. Special Handling Instructions and Additional Information 1. 1X MW 07 Spill with POB2 Profile #00500759 SR# 933323-1 81640543 used 9552K Out of Service Date 06/14/10							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Stephen A Etzel				Signature <i>[Signature]</i>		Month Day Year 06 28 10	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name ROBERT SILLSBY				Signature <i>[Signature]</i>		Month Day Year 06 28 10	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Qty estimated/actual used 9552K Manifest Reference Number: _____							
18b. Alternate Facility (or Generator)						U.S. EPA ID Number	
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator)						Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H132		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Robert K. Kloc				Signature <i>[Signature]</i>		Month Day Year 06 29 10	

EP-6374

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MEP000018529		2. Page 1 of 1	3. Emergency Response Phone 877-846-0447		4. Manifest Tracking Number 003974027 JJK		
5. Generator's Name and Mailing Address HPC Village at Little Falls LLC 100 Commercial St. Portland, ME 04101 207-832-4122				Generator's Site Address (if different than mailing address) 7 Depot St South Windham, ME 04062					
6. Transporter 1 Company Name Anterbach				U.S. EPA ID Number MEP000000555					
7. Transporter 2 Company Name				U.S. EPA ID Number					
8. Designated Facility Name and Site Address JVM Chemical Services, LLC 1550 Salmer Road Hopedale, NY 1407 716-754-2251				U.S. EPA ID Number NY 001556679					
Facility's Phone:									
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.	FILL LIQUID, Waste Power Generation Equipment, Solid Material, 9.1			1		1	1	1
	2.								
	3.								
	4.								
14. Special Handling Instructions and Additional Information 1. 100 lb. Bag with PCBs Profile #00000723 SR# 933322-2 Unit of Service Date 6-14-10									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name Stephen A Etzel				Signature <i>[Signature]</i>		Month Day Year 06 24 10			
TRANSPORTER INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____								
	17. Transporter Acknowledgment of Receipt of Materials								
	Transporter 1 Printed/Typed Name Dana Aldrich				Signature <i>[Signature]</i>		Month Day Year 06 24 10		
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name				Signature		Month Day Year		
	18. Discrepancy								
	18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input checked="" type="checkbox"/> Type ADD B007 <input type="checkbox"/> Residue <input type="checkbox"/> Full Rejection Liner failed, container should be decontaminated in accordance with 40 CFR 761.79. Manifest Reference Number: _____								
	18b. Alternate Facility (or Generator) U.S. EPA ID Number								
	Facility's Phone: _____								
18c. Signature of Alternate Facility (or Generator) Month Day Year									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. H132 2. 3. 4.									
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name Roberta Klock				Signature <i>[Signature]</i>		Month Day Year 06 24 10			